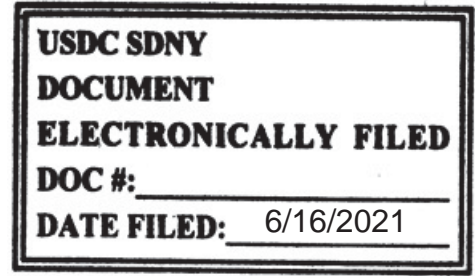




THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
100 CHURCH STREET  
NEW YORK, NY 10007

GEORGIA M. PESTANA  
Acting Corporation Counsel



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June 16, 2021

**BY E.C.F.**

Honorable Robert W. Lehrburger  
United States Magistrate Judge  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: Alonza I. Knowles v. St. Barnabas Hospital, et al., 21-CV-2569 (GHW)  
(RWL)

Your Honor:

I am an Assistant Corporation Counsel in the Office of Georgia M. Pestana, Acting Corporation Counsel of the City of New York, and the attorney for defendant City of New York ("City"), in the above-referenced matter. In that capacity, the undersigned respectfully writes to request a fourteen-day (14) enlargement of time from June 24, 2021 to July 8, 2021 to file defendant's motion to dismiss pursuant to the Federal Rules of Civil Procedure Rule 12(b)(6). *See* Docket Entry Number 33. The undersigned makes this request because of the City's current technological limitations. This is defendant's second request for an enlargement of time in this matter. *See* Docket Entry Number 32. Pursuant to your Honor's Individual Rules, the undersigned attempted to contact plaintiff telephonically on June 16, 2021, to obtain plaintiff's consent to the request herein, but plaintiff did not answer his phone on two occasions.

As Court is likely aware, the New York City Law Department identified unauthorized access within the NYC Law Department's IT environment last week. *See* Benjamin Weiser and Ashley Southhall, *New York City's Law Dept. Is Struck by Cyberattack; Extent of Breach Is Unclear*, N.Y. Times, June 8, 2021, at A19. As a result, the Law Department's computer systems were taken off-line and staff was unable to access systems, including not only email, but also electronic files and address books. Accordingly, and in light of the City's current technological limitations, defendant respectfully request an enlargement of time from June 24, 2021 to July 8, 2021 to file defendant's motion to dismiss plaintiff's Complaint pursuant to FRCP Rule 12(b)(6).

Thank you for your consideration herein.

Respectfully submitted,

Joshua Kaufman  
Joshua Kaufman  
Assistant Corporation Counsel  
Special Federal Litigation Division  
(212) 356-3521

cc: **Via FIRST CLASS MAIL**  
Alonza I. Knowles  
Plaintiff *Pro Se*  
2066 Morris Avenue Apt. 405  
Bronx, NY 10453

Defendant's request is granted.  
Motion to dismiss due by **July 8, 2021**. Plaintiff's opposition due by **August 7, 2021**. Plaintiff's reply, if any, due by **August 21, 2021**.

SO ORDERED:

6/16/2021



HON. ROBERT W. LEHRBURGER  
UNITED STATES MAGISTRATE JUDGE

The Clerk's Office is respectfully directed to mail a copy of this Memo Endorsement to Plaintiff pro se and note service on the docket.